

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

KIMBERLY STARLING, *on behalf
of herself and all others similarly situated*,

Plaintiff,

v.

KEYCITY CAPITAL, LLC and
TIE LASATER,

Defendants.

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CA No.: 3:21-cv-818-S

Class Action
Jury Demanded

PLAINTIFF’S OPPOSED MOTION FOR PLACEMENT ON EXPEDITED DISCOVERY DOCKET

Plaintiff, Kimberly Starling (“Plaintiff” or “Ms. Starling”), individually, and on behalf of all others similarly situated, files this Motion to Place her Motion to Compel on the Expedited Discovery Docket of December 17, 2021.

The Motion to Compel is being filed on December 6, 2021. Thus, this motion is filed greater than 10 days from the December 17 docket.

This is a putative class action in which, when certified, notice must be sent to potential class members. Thus, the case takes longer than normal litigation. The discovery dispute concerns the identity of those potential class members. Expediting this discovery dispute will assist Plaintiff in complying with the Court’s scheduling order. Plaintiff must designate her experts by January 5, 2022, and discovery closes on May 1, 2022.

Additionally, this is a single-issue dispute. Are Defendants required to provide the data for any of the prerecorded solicitation messages sent to anyone other than the individuals that received messages related to the specific dinner to which Ms. Starling was solicited?

Respectfully submitted,

By: /s/ Chris R. Miltenberger
Chris R. Miltenberger
Texas Bar Number: 14171200

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(Admitted Pro Hac Vice)

Attorneys for Plaintiff

CERTIFICATE OF CONFERENCE

I certify that on December 3, 2021, I conferred with Stuart Cochran, counsel for Defendants, regarding placing the motion to compel on the Court's expedited docket and he opposed doing so.

By: /s/ Chris R. Miltenberger
Chris R. Miltenberger

Certificate of Service

The undersigned certifies that the foregoing document was filed electronically through the Court's CM/ECF system in compliance with the Local Rules.

By: /s/ Chris R. Miltenberger
Chris R. Miltenberger